

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

FROST SOLUTIONS, LLC,

Plaintiff,

v.

PATRICK BAGLIEN, CHRISTOPHER LAREAU,  
and VUE ROBOTICS, LLC,

Defendants.

Civ. Action No. 1:22-cv-00401-SE

**DECLARATION OF GINA M. McCREADIE IN SUPPORT OF DEFENDANT  
CHRISTOPHER LAREAU'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON  
ONE ASPECT OF COUNT III (BREACH OF SEPARATION AGREEMENT)**

I, Gina M. McCreadie, do hereby declare and state the following:

1. This declaration is offered in support of *Defendant Christopher Lareau's Motion for Partial Summary Judgment on One Aspect of Count III (Breach of Separation Agreement)* and memorandum of law in support thereof (the "MOL") filed contemporaneously therewith.

2. I am an attorney at Nixon Peabody LLP, Exchange Place, 53 State Street, Boston, Massachusetts 02109, and counsel for Defendant Christopher Lareau ("Lareau") in the above-captioned action.

3. Attached hereto as Exhibit 1 is a true and correct copy of an email dated September 29, 2021 from [REDACTED]

[REDACTED]  
[REDACTED] bearing production numbers Gallagher\_0001860 – Gallagher\_001875.

4. Attached hereto as Exhibit 2 is a true and correct copy of a document entitled,

[REDACTED]

[REDACTED], bearing productions FROST\_0024481 – FROST\_0024487.

5. On or about October 18, 2023, Defendants put Plaintiff Frost Solutions, LLC (“Frost Solutions”) on notice – with citations to supporting caselaw – that the non-compete provision contained within Lareau’s separation agreement is unenforceable as a matter of law under Indiana law because Lareau never consented to assignment of that agreement to Frost Solutions.

6. As of the date of this declaration, Frost Solutions continues to pursue its Non-Compete claim against Lareau.

I declare under penalty of perjury as provided by law that the statements contained in this declaration are true and correct to the best of my knowledge and belief.

EXECUTED this 12th, day of March, 2024.

/s/ Gina M. McCreadie  
Gina M. McCreadie